

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-cv-60807-WPD

PURPLE INNOVATION, LLC,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED
LIABILITY COMPANIES, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS IDENTIFIED
ON SCHEDULE A,

Defendants.

**DECLARATION OF LEIGH SALOMON IN SUPPORT OF PLAINTIFF'S
MOTION TO EXTEND *EX PARTE* TEMPORARY RESTRAINING ORDER**

I, Leigh Salomon, declare and state as follows:

1. I am over 18 years of age, and I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff's Motion to Extend the *Ex Parte* Temporary Restraining Order ("TRO"), Reschedule Hearing on its Motion for Preliminary Injunction, and Extend the Briefing Deadlines. If called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am one of the attorneys for Plaintiff, PURPLE INNOVATION, LLC ("Plaintiff").

3. As of the filing of Plaintiff's Motion, counsel for Plaintiff provided, or caused to be provided, copies of the TRO to counsel and/or representatives for the Third Party Providers providing services to the Defendants identified in Schedule A to the Complaint (*i.e.*, AliExpress, Amazon, DHgate, eBay, Shein, Temu, and Walmart).

4. To date, Plaintiff has only received discovery from eBay. Plaintiff has not received

discovery from any of the other platforms.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 23rd of May, 2025, at Miami, Florida.

/s/ Leigh Salomon
Leigh Salomon